## **DRAFT** Preliminary Assessment Petition

Region IX United States Environmental Protection Agency Superfund Division 75 Hawthorne Street San Francisco, California 94105

Under the authority of CERCLA Section 105 (d), as amended, the petitioner

(Name): Orange County Water District

(Address): 18700 Ward Street, Fountain Valley, California 92708

(Telephone Number): (714) 378-3337

Hereby requests that Region IX conduct a preliminary assessment of the suspected release of a hazardous substance, pollutant, or contaminant at the following location:

**Location Description:** The site is located at 350 South Raymond Avenue, Fullerton, California and is referred to as the Chicago Musical Instruments Site. The site is located in an industrial area approximately one mile north of Highway 91, at the northwest corner of the intersection of South Raymond Avenue and Valencia Drive. Figure 1 is a site location map.

Petitioner is affected by the release because: The groundwater basin that underlies the northern and central portions of Orange County is the source of potable water for more than 20 cities and water agencies that serve more than 2.3 million Orange County residents. Groundwater beneath the northern portion of the Orange County Groundwater Basin (referred to herein as North Basin) has been impacted by Volatile Organic Compounds (VOCs) at concentrations exceeding drinking water standards. Through its enabling legislation, Orange County Water District (OCWD) is responsible for managing groundwater supplies, including water quality, within the entire Groundwater Basin. To date, four water supply wells in the North Basin area have been closed due to VOC contamination, and approximately 10 additional water supply wells are threatened. The impacted areas are associated with chemical releases at multiple long-term industrial sites in the area.

Three below-grade sumps were historically used to clean metal parts. Available soil and groundwater data collected at the site suggest that this site may be a significant contributor to the North Basin groundwater contamination.

Type or characteristics of the substances involved: Available and soil and groundwater data collected at the site since 2009 indicate that tetrachloroethene (PCE), trichloroethene (TCE) and 1,1-dichloroethene (1,1-DCE) are the primary VOCs in soil and groundwater beneath the site. The highest concentrations of VOCs in soil have been encountered in soil samples collected near the former degreaser sump inside the building. PCE, TCE and 1,1-DCE were detected at concentrations up to 13,000,000 micrograms per kilogram ( $\mu$ g/kg), 160,000  $\mu$ g/kg and 280,000  $\mu$ g/kg. Based upon a recent report posted on Envirostor, the highest concentrations of VOCs in groundwater are generally detected in two wells located near the former main degreaser sump. PCE, TCE and 1,1-DCE have been detected at concentrations up to 6,800 micrograms per liter ( $\mu$ g/l), 1,200  $\mu$ g/l and 1,700  $\mu$ g/l, respectively. Relatively high concentrations of these VOCs were also detected in another onsite monitoring well.

Nature and history of any activities that have occurred regarding the release: From 1964 through 1979, the site was owned and occupied by Chicago Musical Instruments (CMI). CMI manufactured musical instruments. CMI constructed several concrete sumps within the manufacturing building that were apparently used for degreasing. A three-stage clarifier is also located onsite and adjacent to the southeast corner of the building. United Duralume Products, Inc. (UDP) purchased the property from CMI in November 1979. At that time, conducting due diligence for possible contamination was not a standard practice. UDP, a small family-owned business, operates machinery that bends aluminum sheeting. Some of their products including siding for buildings and patio covers. After purchasing the property, UDP filled the sumps with concrete so they would not interfere with their operations. UDP continues to occupy the site for metal fabrication or aluminum siding and patio covers.

State and local authorities you have contacted about the release and the response, if any: In February 2010, the California EPA Department of Toxic Substances Control (DTSC) issued an Imminent and/or Substantial Endangerment Order and Remedial Action Order. Starting in 2012, DTSC has been using state funds to remove VOCs from soil beneath the site. To date, more than ?? pounds of VOCs have been removed from soil as a result of DTSC's involvement. However, VOCs in groundwater beneath and especially, downgradient of the site remain unaddressed. DTSC has initiated community involvement activities for this site. In meetings with DTSC staff over the past year, OCWD has recognized and appreciated the soil remediation accomplished to date by DTSC at the CMI site, but has also expressed its concerns about the lack of offsite remediation of groundwater.